

## **REMARKS**

In view of the following remarks, reconsideration of the rejections is respectfully requested.

### **I. 35 U.S.C. § 103(a) Rejections**

Claims 79-86 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Guy and Broughton in view of various combinations of MacCriskin, Fink, Kiriya and Geiger. These rejections are respectfully traversed for the following reasons.

Independent claim 79 recites a data reception method including setting predetermined transmission data (included in a received uncompressed packet) as an initial value of update information (which is used to restore transmission data from a compressed packet). Further, the method of claim 79 includes subsequently updating the update information to information included in transmission data that is restored from a specific compressed packet, each time when the transmission data from the specific compressed packet is restored, such that the update information is not updated when the compressed packet other than the specific compressed packet is received.

Based on the above-mentioned structure required by claim 79, when (i) the uncompressed packet is received, and (ii) when the specific compressed packet is received, the update information is respectively subjected to the “setting” and the “subsequently updating,” as recited in claim 79. Further, based on the above-mentioned structure required by claim 79, when a compressed packet other than the specific compressed packet is received, the update information is not updated.

In other words and in order to simplify the complex nature of the invention of claim 79, the Applicants submit that claim 79 requires that, when the uncompressed packet is received, the update information is set to the predetermined transmission data included in the uncompressed packet such that the predetermined transmission data serves as the initial value of the update information. Next claim 79 requires that, in each case of restoring the received specific compressed packet, the update information is updated to the information included in the transmission data which is obtained by receiving and restoring the specific compressed packet, such that, when a compressed packet other than the specific compressed packet is received to be restored, the update information is not updated.

Initially, please note that the above-described 35 U.S.C. § 103(a) rejection acknowledges that Guy fails to disclose or suggest the above-mentioned “setting,” as recited in claim 79. In light of the above, the present rejection relies on Broughton for teaching the “setting,” as recited in claim 79. However, for the following reasons it is respectfully submitted that Broughton also fails to disclose or suggest the “setting,” as recited in claim 79.

Specifically, the Applicants note that on page 7 of the Office Action the rejection relies on col. 5, lines 27-49 of Broughton for teaching “setting the predetermined information data in the uncompressed packet as an initial value of the updated information,” as recited in claim 79. However, after reviewing col. 5, lines 27-49 of Broughton, it is clear that Broughton teaches that “the degree of compression to be utilized for a given session is negotiated at the establishment of the session ... In general, it is necessary to have a compression negotiation sequence at the establishment of each session and also at any time when a given node changes its compression capability during a session.” In other words, Broughton merely teaches the ability to change a compression capability at a start of a session or during the session.

Thus, in view of the above, it is clear that Broughton teaches changing a compression capability at a start of or during a session, but fails to disclose or suggest that (i) the update information, which is set to the initial value when the uncompressed packet is received, is adopted as the target of update, and (ii) the update information is updated to the information included in the transmission data that is obtained by receiving the specific compressed packet, as required by claim 79.

In other words, Broughton's disclosure of changing a compression capability is not a disclosure or suggestion of setting the predetermined information data in the uncompressed packet as an initial value of the update information (i.e., when the uncompressed packet is received, the update information is set to the predetermined transmission data included in the uncompressed packet such that the predetermined transmission data serves as the initial value of the update information), as required by claim 79.

Next, the above-described 35 U.S.C. § 103(a) rejection acknowledges that the combination of Guy and Broughton fails to disclose or suggest the above-mentioned "subsequently updating," as recited in claim 79. In light of the above, the present rejection relies on MacCriskin for teaching the "subsequently updating," as recited in claim 79. However, for the following reasons it is respectfully submitted that MacCriskin also fails to disclose or suggest the "subsequently updating," as recited in claim 79.

Specifically, the Applicants note that on page 8 of the Office Action the rejection relies on col. 9, lines 49-55 of MacCriskin for teaching "subsequently updating the update information to information included in the transmission data restored from a specific compressed packet each time when the transmission data from the specific compressed packet is restored, such that the

update information is not updated when the compressed packet other than the specific compressed packet received” as recited in claim 79.

However, after reviewing col. 9, lines 44-55 of MacCrisken, it is clear that MacCrisken teaches that (i) a plurality of E tables are preliminarily held, and (ii) in order to obtain a better compression ratio one E table corresponding to a table number designated by “escape code/table change code/table number/p/c” (which is inserted into a current data packet) is selected. In other words, MacCrisken teaches selecting another E table from among a plurality of previously stored E tables in order to improve compression, wherein the E table to be selected is identified using “escape data,” which is not the same as or included in the claimed “transmission data.”

Thus, in view of the above, it is clear that MacCrisken teaches selecting another E table using “escape data,” but fails to disclose or suggest that the update information, which is set to the initial value when the uncompressed packet is received, is made a target for an update, and this update information is updated to the information that is included in the transmission data which is restored upon receiving the specific compressed packet, as recited in claim 79.

Furthermore, in view of the above it is apparent that MacCrisken teaches that the “escape data” is excluded from the transmission data (i.e., the escape data is merely temporarily put into the current data packet to identify a new table when a table change is to be performed), which is contrary to the update information being updated to the information that is included in the transmission data that is restored upon receiving the specific packet, as required by claim 79.

Thus, for the reasons discussed above, it is clear that MacCrisken fails to disclose or suggest subsequently updating the update information to information included in the transmission data that is restored from a specific compressed packet, each time when the transmission data from the specific compressed packet is restored, such that the update

information is not updated when the compressed packet other than the specific compressed packet is received, as recited in claim 79.

Alternatively, the above-described 35 U.S.C. § 103(a) rejection relies on Geiger for teaching the “subsequently updating,” which is admittedly lacking from the Guy and Broughton references. However, for the following reasons it is respectfully submitted that Geiger also fails to disclose or suggest the “subsequently updating,” as recited in claim 79.

Specifically, the Applicants note that on page 8 of the Office Action the rejection relies on Fig. 8 of Geiger for teaching “subsequently updating the update information to information included in the transmission data restored from a specific compressed packet each time when the transmission data from the specific compressed packet is restored, such that the update information is not updated when the compressed packet other than the specific compressed packet received” as recited in claim 79.

However, after reviewing Fig. 8 of Geiger, it is clear that Geiger teaches updating an expansion database by adding a new data entry to the expansion database only when a selected data packet is received (see steps 807, 813, 817, 819, 821 and 823, wherein (i) the compressed data must include a selected data packet, (ii) a response packet is transmitted only if the compressed data includes the selected data packet, (iii) only if the response packet is transmitted and received, will the database be updated, and (iv) the expansion of the compressed data packets is only performed based on the updated expansion database, if the database is updated).

More specifically, according to Fig. 8 of Geiger the expansion database creates new entries (i.e., expanded representations and associated compressed representations) for the stored selected data packets, and upon updating the database, the receiving device performs an expansion of the additionally compressed data packets based on the updated expansion database,

thus, when the receiving device uses the updated database to perform the expansion, the receiving device is adaptively expanding the received compressed data packets to recover the data packets that were adaptively compressed by the transmitting device in response to receipt of the response packet (see col. 16, lines 26-43, which explains the steps illustrated in Fig. 8).

In other words, according to Geiger, the selected data packet, which includes an expand representation and an associated compressed representation, is added as a new data entry without being compressed.

Thus in view of the above, it is clear that Geiger teaches the selected data packet, which includes an expand representation and an associated compressed representation, is added as a new data entry without being compressed, but fails to disclose or suggest that the update information, which is set to the initial value when the uncompressed packet is received, is made a target for an update, and this update information is updated to the information that is included in the transmission data which is restored upon receiving the specific compressed packet, as recited in claim 79.

Put another way, Geiger teaches that the selected data packet is added as a new data entry without being compressed, which fails to disclose or suggest that the update information is updated to the information which is included in the transmission data restored from the compressed packet (i.e., the update information is updated from information compressed in the specific compressed packet), as required by claim 79.

Moreover, in view of the above it is evident that Geiger teaches adding a new entry to the database using a selected data packet, which is completely different from updating the value of the update information itself (i.e., the value of the update information itself is altered), as required by claim 79.

Therefore, because of the above-mentioned distinctions it is believed clear that claim 79 would not have been obvious or result from any combination of Guy, Broughton, MacCrisken and Geiger.

Regarding dependent claims 80-82, which were rejected under 35 U.S.C. § 103(a) as being unpatentable over Guy, Broughton, MacCrisken and Geiger (primary references) in view of various combinations of Fink and Kiriyaama (secondary references), it is respectfully submitted that these secondary references do not disclose or suggest the above-discussed features of independent claim 79 which are lacking from the primary references. Therefore, no obvious combination of the primary references with any of the secondary references would result in, or otherwise render obvious, the invention recited independent claim 79 and claims 80-82 that depend therefrom.

Furthermore, there is no disclosure or suggestion in Guy, Broughton, MacCrisken, Geiger, Fink and/or Kiriyaama or elsewhere in the prior art of record which would have caused a person of ordinary skill in the art to modify Guy, Broughton, MacCrisken, Geiger, Fink and/or Kiriyaama to obtain the invention of independent claim 79. Accordingly, it is respectfully submitted that independent claim 79 and claims 80-82 that depend therefrom are clearly allowable over the prior art of record.

Independent claim 83 is directed to an apparatus and recites features that correspond to the above-mentioned distinguishing features of independent claim 79. Thus, for the same reasons discussed above, it is respectfully submitted that claim 83 and claims 84-86 that depend therefrom are allowable over the prior art of record.

## **II. Double Patenting Rejection**

Claims 79-86 were rejected on the ground of nonstatutory obviousness-type double patenting as being unpatentable over claims 5 and 14 of U.S. 6,914,903 in view of various combinations of Broughton, MacCriskin, and Geiger.

For the reasons discussed above, it is respectfully submitted that independent claims 79 and 83 and the claims that depend therefrom are patentably distinct from the Broughton, MacCriskin and Geiger references. As a result, it is submitted that for the same reasons discussed above regarding the 35 U.S.C. § 103(a) rejections of claims 79-86, the Broughton, MacCriskin and Geiger references cannot be relied upon for disclosing or suggesting the “setting” and “subsequently updating,” as required by independent claims 79 and 83.

Therefore, withdrawal of this rejection is respectfully requested.



### III. Conclusion

In view of the above remarks, it is submitted that the present application is now in condition for allowance and an early notification thereof is earnestly requested. The Examiner is invited to contact the undersigned by telephone to resolve any remaining issues.

Respectfully submitted,

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